

Attachment 47  
Environmental Considerations  
**Telefutura Partnership of Flagstaff**  
KFPH-DT Flagstaff, AZ  
Channel 13 33 kW 475 m

This application proposes continued use of the present KFPH-DT transmitter site, which is a multiple-user tower facility atop Mormon Mountain. The failed main antenna is being replaced by similar, non-directional type with a slightly higher radiation center. The proposed operation represents a 79% reduction in radiated power with respect to the prior analog operation that it will supplant. Continued use of shared sites is environmentally preferred.

Operation is proposed on channel 13, with a radiofrequency radiation (RFR) exposure guideline value of  $200 \mu\text{W}/\text{cm}^2$  for the general population. As demonstrated in the attached RF Radiation Statement, filed with this station's most recent license renewal application, this site was surveyed on 16 May 2006 and found to be compliant with the Commission's exposure guidelines. The instant proposal involves a reduction in channel 13 effective radiated power from 158 kW analog (316 kW visual, adjusted by 0.4, and 31.6 kW aural) to 33 kW digital, a decrease of 79% with respect to the conditions extant when the survey was performed.

The access road to the site is protected by a locked gate. The tower is marked by RFR warning signs. Above-ground work on the tower is governed by a formal RFR protection protocol. Consequently, it may be concluded that implementation of this proposal will result in compliance with the Commission's RFR standards.

26 June 2009

A handwritten signature in black ink, appearing to read 'Karl D. Lahm', written over a horizontal line.

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## **RF Radiation Statement**

The KFPH-TV antenna is mounted with its center of radiation at the 73 meter (239.5') level on a multi-user tower with an overall height of 79.2 meters (260') bearing tower registration number 1003841. KFPH-DT is also side-mounted on the same tower at the 58 meter (190') level. The tower is located at the southern-most portion of the Mormon Mountain Communications Site, which overlooks Flagstaff, Arizona.

KFPH-TV operates on television channel 13 with a peak visual, horizontally polarized ERP of 316 kW. KUVE-DT operates under STA on television channel 27 with an average horizontally polarized ERP of 20 kW.

Vehicular access to this remote site is restricted by means of a locked gate across the road. The gate is marked with appropriate warning signage and such signage is also present at the base of the tower. Nevertheless, in an abundance of caution, this site has been analyzed using the standards for "General Population / Uncontrolled" sites for over exposure to radio frequencies, to account for the possibility that hikers might access the site.

On May 16, 2006, Radiofrequency Safety International Corporation ("RSI") performed a site survey to determine compliance with the requirements of OET-65. The results of the study showed that all areas accessible by the general public were below the maximum levels allowed by ANSI C95.1-1992 and adopted by the Commission as part of OET-65 under the General Population / Uncontrolled category.

All work on the tower is controlled and coordinated by the site owner. KFPH has and will continue to cooperate with the other tenants to ensure climber safety by reducing or ceasing transmissions when workers need to be in, near or pass through the KFPH-TV/DT antenna apertures.

A handwritten signature in blue ink, reading "Timothy P. Schultz", is positioned above a horizontal line.

Timothy P. Schultz  
Vice President Engineering,  
Univision Television Group, Inc.